

**EXHIBIT 16**

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED  
UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
OCT 30 2006  
KENNETH S. GARDNER, CLERK  
PS REF. SJ

In re Chapter 7

LEO STOLLER,  
Debtor.

Case No. 05-64075  
Hon. Jack B. Schmetterer  
Monday, Oct. 30, 2006  
10:00AM

NOTICE OF MOTION AND HEARING

The Debtor ("Debtor"), files and notices its emergency motion for hearing before Judge Jack B. Schmetterer at 9:30, Monday Oct. 30, 2006 in the court occupied by him 682.

Leo Stoller  
7115 West North Avenue #272  
Oak Park, Illinois 60302

NOTICE OF SERVICE

I certify that the following were served via fax and/or email on Sunday Oct. 29, 2006 addressed to:

Janice A. Alwin (6277043)  
Rick Fogel  
Shaw Gussis Fishman Glantz  
Wolfson & Towbin LLC  
321 North Clark Street, Suite 800  
Chicago, IL 60610  
Tel: (312) 276-1323  
Fax: (312) 275-0571  
email: jalwin@shawgussis.com  
Chapter 7 Trustee

Richard N. Golding Esq.  
500 North Dearborn St.  
Second Floor

Chicago, Illinois 60610

Sara B. Lorber Esq.  
Seyforth Shaw LLP  
131 South Dearborn  
Chicago, Illinois 60606  
Counsel for Pure Fishing Inc.

Melvin J. Kaplan Esq.  
14 E. Jackson  
Suite 1200  
Chicago, Illinois 60604

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
OCT 3 6 2006  
KENNETH S. GAHLEINER, CLERK  
PS REP. "SJ"

In re Chapter 7  
LEO STOLLER,  
Debtor.

Case No. 05-64075  
Hon. Jack B. Schmetterer

EMERGENCY MOTION

To File an appeal for

NOW COMES Leo Stoller ("Debtor"), and requests that this Court enter an order stating that the trustee has abandoned the intellectual property and/or trademarks of the estate and other relief and Debtor states as follows:

INTRODUCTION

1. The Debtor Leo Stoller filed a personal chapter 13 in December of 2005. On August 31, 2006, the court converted Leo Stoller to a chapter 7. A trustee was appointed. On Oct. 15, 2006 the court entered an order authorizing the trustee to act on behalf of each of the debtors wholly owned corporations in the capacity of sole shareholder of each respective corporation.
2. The Debtor was in the business of licensing trademarks and litigating to protect those trademarks. The Debtor has over 30 pending Oppositions and Petition to

attached, on Oct. 4, 2006 canceling the Debtors STEALTH trademarks and issuing a sanction against the debtor declaring the debtor a vexatious litigator, assisting attorneys fees against the debtor which may amount to over \$700,000.00 The Debtor and his corporations should be allowed to appeal this order and have the Debtor's corporation represented by counsel. The Debtor has requested permission from the trustee to permit the Debtor's trademark attorney's file a notice of appeal on behalf of the Debtor and the Debtor's wholly owned corporations. The Trustee has refused to give the Debtor permission despite the fact that the cost of the appeal would not be born by the Debtor's estate. Despite the fact that a reversal of the said decision would be an asset of the estate and will result in a large financial payment to the estate.

5. This motion is an emergency motion because the Notice of Appeal must be filed in the Pure Fishing case before Nov. 3, 2006. The trustee prevention of the debtor from having its trademark attorney represent the debtor corporations in an appeal prevents the debtor from realizing the full value of its assets and permits a appealable judgment to stand, which would not otherwise stand, assessing the Debtor \$700,000 in additional attorney fees, canceling 35 STEALTH Federal Trademarks, declaring the debtor a vexatious litigator and barring the Debtor from the filing of any lawsuits.

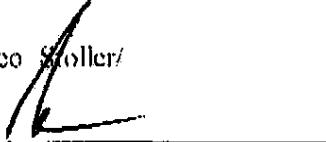
6. The Debtor has waived it right to discharge and the debtor must be permitted under the circumstances to realizing the full value of its assets in order to satisfy the creditors.

WHEREFORE, the Debtor prays, that the court issue an order that the Trustee has abandoned the intellectual property and/or trademarks of the Debtors estate and that they are as a result of abandonment no longer property of the estate and they revert to Leo Stoller.

Secondly, that the court enter an order permitting Leo Stoller to litigating at the Trademark Trial and Appeal Board on behalf of his corporations to protect his trademarks.

Thirdly, that the court enter an order permitting Leo Stoller to retain counsel to represent the debtors corporations in the pending district court cases and Appeals cases in which Leo Stoller and/or his corporations are involved, without any attorney fees being assed to the estate in order for the debtor to realize the full value of its assets. That the court permit the Debtor to retain counsel in order to file its appeal in the Pure Fishing Inc., Case No. 05-CV 00725 on behalf of Debtor's corporations. That the Trustee not be permitted to interfere in all of the Debtors currently filed legal proceedings involving the trademark of the debtor.

/Leo Stoller/

  
Leo Stoller

7115 West North Avenue #272  
Oak Park, Illinois 60302

#### NOTICE OF SERVICE

I certify that the following were served via fax and/or email on Sunday Oct. 29, 2006

addressed to:

Janice A. Alwin (6277043)  
Rick Fogel  
Shaw Gussis Fishman Glantz  
Wolfson & Towbin LLC  
321 North Clark Street, Suite 800  
Chicago, IL 60610  
Tel: (312) 276-1323  
Fax: (312) 275-0571  
email: [jalwin@shawgussis.com](mailto:jalwin@shawgussis.com)  
Chapter 7 Trustee

Richard N. Golding Esq.  
500 North Dearborn St.  
Second Floor  
Chicago, Illinois 60610

Sara E. Lorber Esq.  
Seyforth Shaw LLP  
131 South Dearborn  
Chicago, Illinois 60606  
Counsel for Pure Fishing Inc.

Melvin J. Kaplan Esq.  
14 E. Jackson  
Suite 1200  
Chicago, Illinois 60604

  
/Leo Stoller/ Oct 29, 2006

## Stoller Bankruptcy Trustee Willing to Dismiss Pending Proceedings

The Chapter 7 Trustee for the estate of Leo Stoller (see \_\_\_\_\_ postings \_\_\_\_\_ and \_\_\_\_\_) has sent the following e-mail to me, indicating his willingness to dismiss without prejudice pending proceedings involving the mark STEALTH. He would also consider resolution of proceedings involving other marks asserted by Stoller. The Trustee's message is set forth below.



Dear Mr. Welch:

By Order of the U.S. Bankruptcy Court for the Northern District of Illinois effective September 1, 2006, I have been appointed the chapter 7 trustee in connection with the administration of the estate of Leo Stoller. This authority vests in me the ability to begin, maintain, terminate, or settle any pending proceeding that involves Mr. Stoller or any of his proprietorship entities. By further Order of the Court effective October 5, 2006 that authority has been extended to include actions as sole share holder of all corporate entities owned or controlled by Mr. Stoller. Mr. Stoller has thus been relieved of his ability to act as a representative of his corporations or proprietorships, including the filing of or response to any motions in any pending trademark opposition or cancellation proceedings.

I have reviewed what information has been provided regarding any business activity that would give rise to potential trademark rights, whether registered or at common law. I have also reviewed the district court's Judgment dated October 4, 2006 in connection with Central Mfg. Co. v. Pure Fishing, Inc., No. 05 C 00725 (N.D. Ill.) which cancelled a number of STEALTH-based trademark registrations.

In connection with any trademark opposition or cancellation that was pending on or before September 1, 2006, you may announce in the TTABlog that I would immediately consider any reasonable Agreed Motion to Dismiss Without Prejudice such a proceeding that involved any of the STEALTH trademark rights asserted by Mr. Stoller or one of his corporate entities. I would also agree to consider, on a case-by-case basis, oppositions or cancellation proceedings that involved other trademark rights asserted by Mr. Stoller following a reasonable investigation into the basis for the proceeding.

Richard M. Fogel

(Not individually but as chapter 7 trustee in the estate of Leo Stoller)

Shaw Cussis Fishman Glantz Wolfson & Towbin LLC

221 N. Clark Street, Suite 800

Chicago, IL 60610

Direct dial: (312) 276-1334

Direct fax: (312) 275-0576

The Order authorizing the Trustee to act on behalf of Stoller's wholly-owned companies may be found [redacted]. It would probably be wise to include a copy of that Order as an exhibit to any stipulated dismissal paper.

In two STEALTH oppositions, the applicants have already filed papers signed by the Trustee, to effect dismissal of the oppositions without prejudice.

In *Central Mfg. Co. v. Picekovic*, Opposition No. 91164582, the parties filed an "Agreed Motion to Dismiss" [redacted], and the Board accordingly dismissed the proceeding without prejudice [redacted].

In *Central Mfg. Co. v. Premium Prods., Inc.*, Opposition No. 71159950, the parties filed a "Stipulated Dismissal without Prejudice" [redacted]. [Under Rule 41(a)(1), FRCP, this stipulated dismissal is effective immediately, even without Board action. I think this is the better of the two approaches]. TTAB dismissal [redacted].

Text Copyright John L. Welch 2006.

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>ESTTA Tracking number: **ESTTA104313**Filing date: **10/16/2006**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91159950
Party	Defendant PREMIUM PRODUCTS, INC. PREMIUM PRODUCTS, INC. P.O. Box 444 Mount Vernon, VA 22121
Correspondence Address	H. JAY SPIEGEL H. JAY SPIEGEL & ASSOCIATES PO BOX 11 MOUNT VERNON, VA 22121
Submission	Other Motions/Papers
Filer's Name	H. Jay Spiegel
Filer's e-mail	jayspiegel@aol.com
Signature	/H. Jay Spiegel/
Date	10/16/2006
Attachments	groundzerostealth.stipotdismissal.certofservice.101606.pdf ( 1 page )(25218 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

CENTRAL MFG. CO. P.O. Box 35189 Chicago, IL 60707-0189	Trademark: GROUND ZERO STEALTH
Opposer,	Application SN: 76/505,385
v.	Int. Class No.: 28
PREMIUM PRODUCTS, INC. (a Virginia Corporation) P.O. Box 11 Mount Vernon, VA 22121	Filed: April 1, 2003 Published: November 25, 2003
Applicant.	Opposition No.: 91159950

CERTIFICATE OF SERVICE

I hereby certify that a true copy of a STIPULATED DISMISSAL WITHOUT PREJUDICE, electronically filed using the TTAB ESTTA System on October 15, 2006, was served by First Class Mail, postage prepaid, this 16<sup>th</sup> day of October, 2006, on the following Opposer:

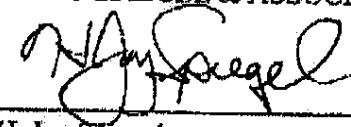
CENTRAL MFG. CO.  
c/o Richard M. Fogel, Esquire  
Chapter 7 Trustee of the  
Bankruptcy Estate of Leo Stoller  
Shaw Gussis Fishman Glantz  
Wolfson & Towbin LLC  
321 North Clark Street, Suite 800  
Chicago, IL 60610.

DATED: October 16, 2006

Respectfully submitted,

H. JAY SPIEGEL & ASSOCIATES

H. JAY SPIEGEL & ASSOCIATES  
P.O. Box 11  
Mount Vernon, Virginia 22121  
(703) 619-0101 - Phone  
(703) 619-0110 - Facsimile

  
H. Jay Spiegel  
Attorney for Applicant  
Registration No. 30,722

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: ESTTA104110

Filing date: 10/13/2006

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91164582
Party	Defendant Pocckovic, Jovan Pocckovic, Jovan 3815 West 11th, Avenue CAX Vancouver, V6R 2K8
Correspondence Address	JOVAN POCEKOVIC 3815 WES 11TH AVENUE VANCOUVER, CANADA V6R 2K8 . DA
Submission	Other Motions/Papers
Filer's Name	Lance G. Johnson
Filer's e-mail	ljohnson@roylance.com, usdocketing@roylance.com, john@stealthvodka.com, rfogel@shawgussis.com
Signature	/LanceJohnson/
Date	10/13/2006
Attachments	Dismissal order- Stealth Vodka.pdf ( 1 page )(7767 bytes ) Order converting case and appointing trustee.pdf ( 1 page )(42831 bytes ) Trustee letter of appointment.pdf ( 1 page )(30533 bytes ) Trustee acts for corps.pdf ( 1 page )(25169 bytes )

IN THE U.S. PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEALS BOARD

Leo Stoller Central Mfg. Co., v.	Opposers	Opposition No. 91164582
Jovan Pocckovic, Applicant		

AGREED MOTION TO DISMISS

October 12, 2006

Applicant and the trustee in bankruptcy for Opposers Leo Stoller and Central Mfg. Co. (see attached) hereby agree to dismiss the above-identified opposition without prejudice. All pending motions are hereby withdrawn and deemed moot.

On Behalf of Applicant:

/LanceJohnson/  
Lance G. Johnson  
*Roylance, Abrams, Berdo & Goodman,  
LLP*  
*1300 19<sup>th</sup> Street, NW Suite 600*  
*Washington, DC 20036*  
*Tel: 202-659 9076*  
*Fax: 202-659 9076*  
*LJohnson@Roylance.com*

Authorized Representative for Opposers:

/Richard Fogel/  
Richard M. Fogel  
(Not individually, but as chapter 7 trustee for the  
bankruptcy estate of Leo Stoller)  
*Shaw, Gussis, Fishman, Glantz & Towbin, LLC*  
*321 North Clark Street, Suite 800*  
*Chicago, IL 60610*  
*Tel: (312) 276-1334*  
*Fax: (312) 275-0578*  
*RFogel@ShawGussis.com*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: ) Case No. 05 B 64075  
LEO STOLLER, ) Chapter 13  
Debtor. ) Honorable Jack B. Schnetterer  
 )  
 )  
 )  
 )

**ORDER CONVERTING CHAPTER 13  
CASE TO A CASE UNDER CHAPTER 7**

This matter having been presented to the Court upon the Motion (the "Motion") to Convert Chapter 13 Case to Chapter 7 and for Immediate Appointment of Trustee filed on March 15, 2006, by Pure Fishing, Inc. ("PFI"), and the Court having conducted a hearing on the Motion and having concluded at the end of that hearing, pursuant to comments which shall be amplified by further findings of fact and conclusions of law, that sufficient cause exists to grant the relief requested in the Motion;

**NOW THEREFORE**, the Court does hereby **ORDER** that:

1. Pursuant to 11 U.S.C. § 1307(c), the Motion is granted and the captioned case hereby is converted from a proceeding under Chapter 13 of the Bankruptcy Code to a proceeding under Chapter 7 of the Bankruptcy Code, *nunc pro tunc* August 31, 2006;
2. Pursuant to 11 U.S.C. § 701, the United States Trustee shall appoint an interim trustee in this case.

SEP 07 2004  
HONORABLE JACK B. SCHMETTERER BANKRUPTCY JUDGE  
HONORABLE JUDGE RAYMOND T. SCHMETTERER

3. This order is effective  
immediately.



U. S. Department of Justice

United States Trustee

*Northern District of Illinois*

227 West Monroe Street

Suite 3350

Chicago, Illinois 60606

312 886-576

FAX / 312 886-575

September 5, 2006

Richard M. Fogel, Esq.  
Shaw, Cussis et al  
321 North Clark Street  
Suite 800  
Chicago, IL 60610

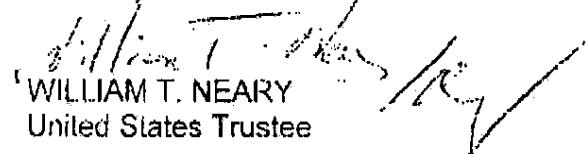
Re: Leo Stoller  
Case number 05 B 64075

Dear Mr. Fogel:

The above captioned case converted from Chapter 13 to Chapter 7 of the Bankruptcy Code on September 1, 2006 and you are appointed to serve as trustee in this matter. Bond is fixed and approved as the blanket bond.

If you reject this appointment you must notify the court and this office within five (5) days of the receipt of this letter. Otherwise you will be deemed to have accepted the appointment.

Sincerely,

  
WILLIAM T. NEARY  
United States Trustee

Rejected:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

09-64075-153.1; Motion to Authorize Proposed Order and Minute Order Entered: 9/26/2006 3:21:30 PM by:Janice A. Alwin Page 1 of 2

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In re**  
**LEO STOLLER,**  
**Debtor.**

**Chapter 7**  
**Case No. 05-64075**  
**Hon. Jack B. Schmetterer**  
**Hearing Date: October 5, 2006**  
**Hearing Time: 10:30 a.m.**

**ORDER AUTHORIZING THE TRUSTEE TO ACT ON BEHALF OF DEBTOR'S  
WHOLLY OWNED CORPORATIONS AND RELATED RELIEF**

Upon consideration of the application (the "Motion") of Richard M. Fogel, not individually, but as chapter 7 trustee (the "Trustee") for the bankruptcy estate of Leo Stoller (the "Debtor"), for the entry of an order authorizing the Trustee to act on behalf of the Debtor's Wholly-Owned Corporations (as defined in the Motion) solely in the Trustee's capacity as the sole shareholder of such corporations; due and proper notice of the Motion having been given; and the Court being otherwise fully advised in the premises; it is hereby

**ORDERED:**

1. Notice of the Motion as provided for therein is sufficient and further notice is waived.
2. The Trustee is authorized to act on behalf of each of the Wholly-Owned Corporations in the capacity of sole shareholder of each respective corporation as set forth in the Motion.

Dated: 10/5/06

*[Handwritten signature]*  
ENTERED  
Bankruptcy Judge  
OCT 05 2006

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Central Mfg. Co., et al.

Plaintiff,

v.

Case No.: 1:05-CV-00725

Pure Fishing, Inc., et al.

Honorable George W. Lindberg

Defendant

PROPOSED FINAL JUDGMENT

Having considered Defs.' Motion to Lift Stay and Enter Final Judgment, the Court hereby enters this final judgment in accordance with Fed. R. Civ. P. 54, 55(b), and 58.

IT IS ORDERED that final judgment is hereby entered in favor of Defendants / Counter-Plaintiffs on counterclaims I-IV against Central Mfg. Co., Leo Stoller an individual doing business as Central Mfg. Co. doing business as S. Industries Inc. doing business as Terminator doing business as Stealth doing business as Rentamark doing business as Rentamark.Com doing business as Stealth Sports and Marine doing business as Association Network Management doing business as USA Sports Co. Inc. doing business as Stealth Industries, Inc. doing business as Central Mfg Inc. doing business as S Industries doing business as Sentra Industries Inc.

IT IS FURTHER ORDERED that this case is "exceptional" under 15 U.S.C. § 1117(a). Counter-Defendants are jointly and severally responsible, and shall pay the Defendants'/Counter-Plaintiffs' costs, charges and disbursements, including a reasonable attorneys' fees, incurred in this action. Defendants / Counter-Plaintiffs shall file the information required by Fed. R. Civ. P. 54(d)(2) in support of its fee award within fourteen (14) days after the date of this Order. Defendants / Counter-Plaintiffs shall file a bill of costs and disbursements on the form provided by the clerk pursuant to Fed. R. Civ. P. 54(d), no later than ten (10) days after the date of this Order.

IT IS FURTHER ORDERED that US Trademark Registration No. 1,766,806 and the STEALTH mark for fishing bobbers are lapsed, invalid, abandoned, unenforceable, and forfeit under federal and common laws.

IT IS FURTHER ORDERED that US Trademark Registration No. 1,766,806 and each of the "Stealth" trademark registrations listed in the Complaint are canceled.

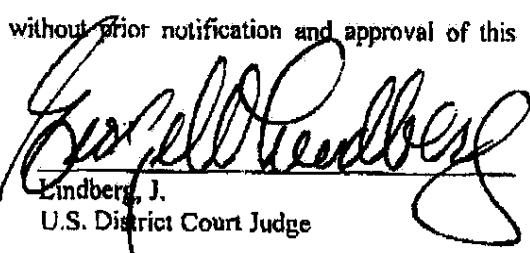
IT IS FURTHER ORDERED that there is no reasonable likelihood of confusion between Plaintiff's STEALTH marks and the SPIDERWIRE STEALTH mark as used by Defendants.

IT IS FURTHER ORDERED that Counter-Defendants, whether or not registered with the State of Illinois, are vexatious litigants and are barred from instituting any lawsuit or trademark opposition without prior leave of this Court pursuant to this Court's authority under the All Writs Act 28 U.S.C. § 1651(a).

IT IS FURTHER ORDERED that Counter-Defendants are liable for the judgment in *S Industries, Inc. v. Centra 2000, Inc.*, 1998 U.S. Dist. LEXIS 10649, 1998 WL 395161 (N.D. Ill. 1998) so as to allow execution of that judgment against such trademark registrations, goodwill, and associated license assets, including US trademark registration nos. 1,332,378 and 1,766,806 and all other trademark registrations at a value of \$245 for each (sanctions of October 12, 2005 hearing) in partial satisfaction of that judgment.

IT IS FURTHER ORDERED that Counter-Defendants are enjoined from dissipating, transferring, assigning, liquidating, or otherwise removing the trademark assets of Plaintiffs and Counter-Defendants to another person or entity without prior notification and approval of this Court.

10/4/06  
Date:

  
Lindberg, J.  
U.S. District Court Judge